



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JPL
F. #2019R01460

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 27, 2023

By ECF

The Honorable Eric N. Vitaliano
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Javier Aguilar
Criminal Docket No. 20-390 (ENV)

Dear Judge Vitaliano:

The government writes, having conferred with defense counsel, to provide an update to the Court concerning the motions which are to be filed in this case by Friday, March 3, 2023. Defense counsel has recently informed the government that in addition to filing the anticipated motion to sever as discussed at the last status conference, the defense also intends to file motions for a bill of particulars and to suppress electronic evidence obtained by the government pursuant to a search warrant.

In light of the recently expanded scope of defense motions to be filed, the government respectfully requests that its response to the motions for a bill of particulars and suppression be due by March 31, 2023, with any reply by the defense due by April 14, 2023.

The briefing schedules previously set by the Court for the motion to sever, as well as the government's initial motion *in limine* to admit evidence of other acts, would remain unaffected.

The government has conferred with defense counsel who consents to this request.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
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Assistant U.S. Attorney
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cc: Counsel of Record (by ECF)